

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

J.R., a minor and Jane Roe, Individually and
in her capacity as guardian and parent of
Plaintiff J.R.,

Plaintiffs,

v.

Michele Mancino, Thomas E. Aspinwall,
Telegram Messenger, Inc. (d/b/a “Telegram”)
and Perry Street Software (D/B/A “Scruff”),

Defendants.

CA: 2:23-CV-02519-BHH-MGB

PLAINTIFFS’ EXPERT DISCLOSURE - RULE 26(A)(2)(A)

Pursuant to Rule 26(a)(2)(A) of the Federal Rules of Civil Procedure, Plaintiffs identify the following non-retained non-retained expert witnesses to be offered at trial.

- (1) **Dorchester Children’s Advocacy Center**
303 E. Richardson Avenue
Summerville, South Carolina 29483

Dorchester Children’s Advocacy Center providers are expected to testify as providers of counseling and treatment of clinical illness and the cause of counseling treatment necessary for minor Plaintiff, including trauma responses from abuse victims like minor Plaintiff. Any opinions formed by Dorchester Children’s Advocacy Center providers are based on personal knowledge obtained from examining and treating the minor Plaintiff. Dorchester Children’s Advocacy Center providers are treating counseling providers that may have opinions due to the treatment of minor Plaintiff and based on education, knowledge and experience in the counseling and sexual trauma arena. Pursuant to Rule 26(a)(2)(A) and (C), an expert report is not required as providers at Dorchester Children’s Advocacy Center are treating counseling providers of minor Plaintiff and that is the sole and only basis of clinical information about any situation involving the minor Plaintiff.

- (2) **North Palm Counseling Center**
Richard Grimball
7138 Cross County Rd, Suite C
North Charleston, South Carolina 29418

Mr. Grimbball from North Palm Counseling Center is expected to testify as a provider of counseling and treatment of clinical illness and the cause of counseling treatment necessary for minor Plaintiff, including trauma responses from abuse victims like minor Plaintiff. Any opinion formed by Mr. Grimbball of North Palm Counseling Center is based on personal knowledge obtained from examining and treating the minor Plaintiff. Mr. Grimbball is a treating counseling provider that may have opinions due to the treatment of minor Plaintiff and based on education, knowledge and experience in the counseling and sexual trauma arena. Pursuant to Rule 26(a)(2)(A) and (C), an expert report is not required as Mr. Grimbball is a treating counseling provider of minor Plaintiff that is the sole and only basis of clinical information about any situation involving the minor Plaintiff.

McGowan, Hood, Felder & Phillips, LLC

s/S. Randall Hood

S. Randall Hood

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